

REMARKS

In the Office Action of August 5, 2003, the drawings were objected to under 37 C.F.R. § 1.83 (a) for failing to show the brake controlled mandrel recited in claim 3. Applicants are submitting with the present amendment a Request For Approval Of Drawing Changes in which Fig. 5 of the drawings is amended in order to show the brake controlled mandrel 51 in place of the motor 50. Applicants have also updated the specification in order to reflect this drawing amendment. As such, Applicants respectfully submit that the drawings do not suffer from any deficiencies.

In the present amendment, Applicants have also amended the paragraph bridging pages 8 and 9 of the application in order to correct for a minor typographical error.

In the Office Action of August 5, 2003, claims 1, 2, 4, 5, 8, 13, 15-17, 20, 22, 24, 25, 28-31, 37, 38, 40, 46, 48, 51, 52, 56, 57, and 60 were rejected under 35 U.S.C. § 102(b) as being anticipated by Morizzo (U.S. Patent No. 4,930,711).

Claims 1, 25, and 34-36 were rejected under 35 U.S.C. § 102(b) as being anticipated by Little (U.S. Patent No. 4,648,990).

Claims 1, 2, 4-6, 9, 10, 12-14, 21, and 23 were rejected under 35 U.S.C. § 102(b) as being anticipated by Johnson et al. (U.S. Patent No. 5,497,959).

Claim 60 was rejected under 35 U.S.C. § 102(b) as being anticipated by Kammann (U.S. Patent No. 5,437,417).

Further, claims 1, 2, 18, 38, 44, 47, 57, 59, and 60 were rejected under 35

U.S.C. § 102(b) as being anticipated by Billingsley (U.S. Patent No. 3,157,371).

Also, claims 31-33 were rejected under 35 U.S.C. § 102(b) as being anticipated by Billingsley.

Also in the Office Action of August 5, 2003, claims 3, 14, 45, and 50 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Diltz (U.S. Patent No. 3,869,095).

Additionally, claims 5, 6, 13, 40, and 41 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Nistri et al. (U.S. Patent No. 4,583,698).

Claims 7 and 49 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Menz et al. (WO 98/52857).

Claims 11 and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Dowd (U.S. Patent No. 4,133,495).

Claim 12 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Urban (U.S. Patent No. 4,988,052).

Claim 19 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Oliver et al. (U.S. Patent No. 5,402,960).

Claims 26, 27, 32, 54, and 55 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo.

Claims 39, 53, and 58 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Billingsley.

Claim 42 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Morizzo in view of Johnson et al.

Claim 10 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Johnson et al. in view of Pretto et al. (U.S. Patent No. 5,379,964).

Claim 12 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Johnson et al. in view of Urban.

Claim 14 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Johnson et al. in view of Diltz.

Applicants respectfully submit that claim 1 defines over Morizzo, Little, Johnson, et al., and Billingsley. Respectfully, these references do not disclose a winder for winding a web which has a winding module that is configured to wind the web to form a rolled product by only center winding, by only surface winding, and by only combinations of center and surface winding. Support for this claim amendment may be found on at least page 8, lines 1-5 of Applicants' application.

Claim 1 calls for a winding module that is configured to wind web by only center winding. Additionally, the winding module as set forth in claim 1 is also configured in order to wind web by only surface winding. Still further, the winding module as set forth in claim 1 is configured to wind web by a combination of center and surface winding. As such, the winding modules as set forth in claim 1 are capable of winding web in three different manners, those manners being:

1. exclusively center winding;
2. exclusively surface winding; and
3. a combination of both center and surface winding.

Applicants respectfully submit that this structure is not found in the cited

references. For instance, Morizzo discloses a fabric winder that is configured only to wind a fabric sheet 10 through surface winding (see Morizzo at column 3, lines 57-65). Little also discloses a wind-up device that is only capable of winding sheets of rubber via surface winding (see Little at column 1, lines 87-91). Likewise, Johnson, et al. discloses a coreless winding method and apparatus that is only capable of winding via surface winding (see Johnson, et al. at column 3, lines 18-29).

Billingsley also fails to disclose the structure set forth in claim 1 of Applicants' application. Billingsley discloses a method and apparatus for winding that does not have the ability to wind web via only center winding. In Billingsley, rewind shafts 17 and 18 are employed and have web strips 11A, 11B disposed thereon that engage a surface winding drum 14, the engagement of which provides a surface rewind pressure to effect surface winding of the web strips 11A, 11B (see Billingsley at column 3, lines 46-50). The entire point of Billingsley is to provide for a method and apparatus for keeping the total surface pressure on the material on the rewind roll during surface winding to be constant throughout the buildup of the roll (see Billingsley at column 3, lines 63-67; and column 3, line 74 to column 4, line 2).

As such, Applicants respectfully submit that claim 1 defines over Morizzo, Little, Johnson, et al., and Billingsley and is in condition for allowance. Further, all claims which depend from claim 1 (claims 2-30) are also in condition for allowance. Their rejections being made moot due to the allowance of claim 1.

As stated, claim 31 was rejected under 35 U.S.C. § 102(b) as being anticipated by Morizzo and Billingsley. Applicants respectfully submit that claim 31 defines over

these references. Respectfully, the references do not disclose a method of producing a rolled product that employs a plurality of winding modules that are configured to wind web by only surface winding, by only center winding, and by only a combination of surface and center winding. This amendment is similar to the amendment made to claim 1, and Applicants respectfully submit that claim 31 defines over both Morizzo and Billingsley for essentially the same reasons as discussed above with respect to these two references in regards to claim 1. Neither Morizzo nor Billingsley discloses a method of producing a rolled product that employs a plurality of winding modules that are configured in order to wind web in accordance with three different configurations, those being only surface winding, only center winding, and by only a combination of surface and center winding. As such, Applicants respectfully submit that claim 31 defines over Morizzo and Billingsley and is in condition for allowance. Further, all claims which depend from claim 31 (claims 32 and 33) are also in condition for allowance. Their rejections being made moot due to the allowance of claim 31.

Claim 34 was rejected under 35 U.S.C. § 102(b) as being anticipated by Little. Applicants have amended claim 34 in order to call for a method of producing a rolled product that employs a plurality of winding modules that are configured to wind web by only surface winding, by only center winding, and by only a combination of surface and center winding. This amendment is similar to the amendment made to claim 1. As such, Applicants respectfully submit that claim 34 defines over Little for essentially the same reasons as discussed above with respect to the allowability of claim 1 in view of Little. Therefore, Applicants respectfully submit that claim 34 is allowable, and that all

claims which depend from claim 34 (claims 35 and 36) are also in condition for allowance. Their rejections being made moot due to the allowance of claim 34.

As stated, claim 37 was rejected in the Office Action of August 5, 2003 under 35 U.S.C. § 102(b) as being anticipated by Morizzo. Applicants respectfully traverse the § 102(b) rejection to claim 37. Respectfully, Morizzo does not disclose a winder that has a winding module with a mandrel that is rotated onto which the web is wound to form the rolled product.

Morizzo discloses a winding device that winds a fabric sheet 10 into a finished roll 15 (see Morizzo at column 2, lines 41-44). The winding method disclosed in Morizzo is surface winding. The device in Morizzo does not have a mandrel, but instead has a supporting roll 22 that is positioned between a pair of cooperating winding rollers 58, 62 (see Morizzo at column 3, lines 60-65). A third roll 88 is moved into engagement with the supporting roll 22 and rotates the supporting roll 22 along with keeping the supporting roll 22 in peripheral winding contact with the rollers 58, 62 (see Morizzo at column 5, lines 60-65). As such, the supporting roll 22 disclosed in Morizzo is not a mandrel.

The supporting roll 22 is simply a roll used in surface winding onto which a rolled product is wound. The supporting roll 22 is not itself wound in order to wind web thereon, but is instead placed between a plurality of rollers and is rotated by one of the other rollers which contacts the supporting roll 22. As is known in the art, a mandrel is a device that is itself rotated without engagement by another roll. As such, the rotational movement of a mandrel is not dependent upon contact with and urging by

another roll. As such, Applicants respectfully submit that claim 37 defines over Morizzo and is in condition for allowance.

As stated, claim 38 was rejected under 35 U.S.C. § 102(b) as being anticipated by both Morizzo and Billingsley. Applicants respectfully submit that claim 38 defines over these references. The references do not disclose a winder for winding a web that has a winding module with a mandrel that is rotated, where if two or more of the winding modules are disabled the remaining winding modules are still able to wind the web. Support for this claim amendment may be found on at least page 16, lines 20-23 of Applicants' application.

With regard to Morizzo, Applicants respectfully traverse the § 102(b) rejection for essentially the same reasons as discussed above concerning the discussion of claim 37 with respect to Morizzo. In regard to Billingsley, the reference discloses a method and apparatus for winding that employs a pair of rewind shafts 17 and 18 (see Billingsley at column 3, line 23). Although it may be possible for Billingsley to continue to wind web should one of the rewind shafts 17 or 18 become disabled, it would be impossible for the device of Billingsley to function should both of the rewind shafts 17 and 18 become disabled. Billingsley does not disclose a third rewind shaft engaging the drum 14, and Billingsley could not be reconfigured to have such a third rewind shaft due to the fact that Billingsley teaches rewind shafts that are in the same horizontal plane (see Billingsley at column 2, lines 16-19). As such, Billingsley discloses only a pair of rewind shafts 17 and 18, and this structure is different that the winder called for in claim 38 of Applicants' application which has winding modules that are capable of winding the web

if two or more of the winding modules become disabled.

As such, Applicants respectfully submit that claim 38 defines over both Morizzo and Billingsley and is in condition for allowance. Also, all claims which depend from claim 38 (claims 39-58) are also in condition for allowance. Their rejections being made moot due to the allowance of claim 38.

Claim 59 was rejected under 35 U.S.C. § 102(b) as being anticipated in view of Billingsley. Applicants have amended claim 59 in a manner similar to the amendment made to claim 1 above. As such, Applicants respectfully submit that claim 59 defines over Billingsley for essentially the same reasons as discussed above with respect to the allowability of claim 1 in view of Billingsley. As such, Applicants respectfully submit that claim 59 is in condition for allowance.

Applicants have amended the paragraph bridging pages 7 and 8 of the specification, and respectfully submit that support for this amendment may be found in the art in which it is known to make web from any type of material. For instance, Little discloses a rubber web, while Kammann discloses a web made of plastic film.

Applicants submit that support for the phrase "or experiences a process fault" may be found in the paragraph bridging pages 21 and 22 of the specification.

Applicants have cancelled claim 60 from the present application. Additionally, Applicants have added new claims 61-70 to further define the invention. Applicants respectfully submit that these newly added claims are allowable, and that the claims are supported by the originally filed specification, drawings, and claims.

Applicants respectfully submit that all pending claims are allowable and that the



application is in condition for allowance. Favorable action thereon is respectfully requested. The Examiner is encourage to contact the undersigned at the Examiner's convenience should he have any questions or require any additional information.

Respectfully submitted,

DORITY & MANNING,
ATTORNEYS AT LAW, P.A.

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Date

Neal P. Pierotti
Neal P. Pierotti, Esquire
Reg. No. 45,716

Post Office Box 1449
Greenville, SC 29602-1449
Telephone: (864) 271-1592
Facsimile: (864) 233-7342